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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DONALD J. TRUMP FOR PRESIDENT,
INC., REPUBLICAN NATIONAL
COMMITTEE, NEW JERSEY
REPUBLICAN STATE COMMITTEE,

No. 3:20-cv-10753-MAS-ZNQ

Plaintiffs,

v.

DECLARATION OF Elissa Voccola

TAHESHA WAY, in her official capacity as
Secretary of State of New Jersey,

Defendant.

I, Elissa Voccola, declare:

1. I am the North East Regional Political Director of the Republican National Committee ("RNC"). I am over the age of eighteen and I have personal knowledge of the following facts. If called as a witness, I could and would competently testify thereto.

2. RNC is a national political party with its principal place of business at 310 First Street S.E., Washington, DC 20003. The RNC represents over 30 million registered Republicans in all 50 states, the District of Columbia, and the U.S. territories. It is comprised of 168 voting members representing state Republican Party organizations.

3. The RNC works to elect Republican candidates to state and federal office. In November 2020, its candidates will appear on the ballot in New Jersey for federal, state, and local offices. In elections for the U.S. House of Representatives, for example, the Cook Political Report lists four New Jersey races as "competitive"—including two "toss ups."

4. The RNC has a vital interest in protecting the ability of Republican voters to cast, and Republican candidates to receive, effective votes in New Jersey elections and elsewhere. The RNC is a plaintiff in this lawsuit to vindicate its own rights in this regard, and in a representational capacity to vindicate the rights of its member voters and candidates.

5. The RNC also has an interest in preventing the New Jersey Legislature's sweeping changes to its election laws. In the RNC's experience, major or hasty changes confuse voters, undermine confidence in the electoral process, and create incentive to remain away from the polls. A4475 imposes such sweeping changes to New Jersey's election laws.

10. One way that RNC supports its candidates and voters is by transferring funds to state parties and portions of its coordinated spending limit to other committees, such as the National Republican Congressional Committee ("NRCC"), which the committees may use to assist in their Election Day Operations and get-out-the-vote initiatives, including educating voters on applicable deadlines and voting procedures. 11 CFR §§ 109.32, 109.33. RNC has made such transfers to the New Jersey Republican State Committee ("NJGOP") and NRCC as a result of the Governor's Executive Order 177 and A4475's subsequent codification and additions to that executive order.

7. These funds and coordinated spending limit may be used by the NJGOP and NRCC to implement changes to their planned Election Day Operations initiatives in response to A4475, including the law now allowing (1) that ballots be counted starting 10 days before Election Day and (2) that "[e]very ballot without a postmark, and ballots mis-marked and confirmed by the post office that those ballots were received by the post office on or before November 3, 2020."

8. Because RNC's resources are finite, it can expend resources responding to A4475 only by diverting them from the pursuit of its mission in other areas

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed September 26, 2020


Elissa Voccola

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